



Eastman Chemical Company  
P.O. Box 511  
Kingsport, TN 37662-5054  
Phone: (423) 229-4076  
Fax: 423-224-0208  
Attention: Linda Lewis

RECEIVED  
OFFICE  
07 NOV - 8 PM 10:35

**EASTMAN**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

October 26, 2007

Document Processing Center (Mail Code 7407M)  
Attention: TSCA Section 8(e)  
Office of Pollution Prevention & Toxics  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Contain NO CBI



**Re: Section 8(e) Submission for dimethyl phthalate (CAS# 131-11-3), diethyl phthalate (CAS# 84-66-2), dibutyl phthalate (CAS# 84-74-2) and diethylhexyl phthalate (CAS # 117-81-7).**

Dear Sir or Madam:

Eastman Chemical Company (Eastman) hereby submits the below-described information with respect to dimethyl phthalate (DMP; CAS# 131-11-3), diethyl phthalate (DEP; CAS# 84-66-2), dibutyl phthalate (DBP; CAS# 84-74-2) and diethylhexyl phthalate (DEHP; CAS # 117-81-7), in accordance with Section 8(e) of the Toxic Substances Control Act (TSCA).

By letter dated October 1, 2007, Eastman received for comment a draft manuscript titled "Urinary Phthalate Metabolite Concentrations Among Workers in Selected Industries" by Cynthia J. Hines, *et al.* of the National Institute for Occupational Safety and Health (NIOSH; 4676 Columbia Pkwy, R-14; Cincinnati, OH 45226). The authors describe this study as a preliminary screening effort to determine if there was occupational exposure to a panel of seven phthalates across a range of occupational settings, including DMP, DEP, DBP, and DEHP. As a manufacturer of DMP, DEP, DBP and DEHP, Eastman summarizes the results of this study across the various occupational settings.

The investigators measured urinary metabolites of seven phthalate esters in 156 workers across eight industry sectors. The study compared creatinine-adjusted metabolite concentrations between urine samples obtained at mid-shift and end-shift. The study found a statistically significant increase in monoester metabolites of DMP, DEP and DBP in manufacturing and other industry sectors that utilize these chemicals in the manufacture of various end-products. Urinary metabolites of DEHP increased significantly in three industry sectors from mid-to end-shift but not the manufacturing sector. Start-of-shift or baseline urinary concentrations for these metabolites are not reported in this study. The authors also compare the end-shift results to the values reported in the CDC National Health and Nutrition Examination Survey (NHANES) for 2001-2002. These comparisons reveal significantly higher urinary monoester concentrations for phthalates in employees across many industry sectors.

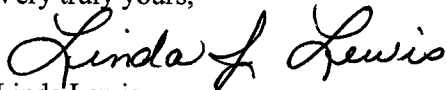
Please note that the draft manuscript acknowledges several limitations to the study. Additionally, the study makes no attempt to correlate the concentration of urinary metabolites with an exposure level or with a potential

*Neither Eastman nor its marketing affiliates shall be responsible for the use of this information, or of any product, method or apparatus mentioned, and you must make your own determination of its suitability and completeness of your own use, for the protection of the environment, and for the health and safety of your employees and purchasers of your products. No warranty is made of the merchantability or fitness of any product; and nothing herein waives any of the Seller's conditions of sale.*

307955

health effect. Thus, it is not clear that this study is reportable under section 8(e). Eastman believes, however, that submission of this information is both in compliance with TSCA and consistent with good product stewardship. For additional information, Eastman recommends contacting the author at the address provided above. If you have any questions, please contact me at 423-229-4076.

Very truly yours,



Linda Lewis

Director Corporate Health, Safety and Security  
Eastman Chemical Company

cc: 8(e) file/2007-\_\_\_\_